





## Illinois Power Agency Power Hour Webinar 2

CEJA's Impact on Adjustable Block Program

## Agenda



- Introduction and Scope of the IPA Power Hour Webinars
- ABP Under FEJA (Public Act 99-0906)
- Successes And Challenges to Date
- Key Changes to ABP Under CEJA (Public Act 102-0662)
- Category by Category Requirements
- ABP Block Reopening
- Long-Term Plan Development and Approval
- Q&A
- Closing



- Introduction and Scope
- Power Hour is a newly launched series of educational and informative presentations on a wide range of clean energy topics and emerging issues
- Today's Power Hour:
  - We'll discuss success and challenges of the Adjustable Block Program to date and how the recently enacted Climate and Equitable Jobs Act (Public Act 102-0662) impacts the Adjustable Block Program
  - Future IPA Power Hour Webinars will cover other topical areas impacted by Public Act 102-0662



- Introduction and Scope
  - We will not cover items from P.A. 102-0662 related to:
    - Stakeholder feedback processes related to the Adjustable Block Program opening and the Revised Long-Term Plan development
    - Specific program or procurement requirements
    - Issues outside the purview of the IPA such as:
      - Changes to ratemaking
      - Changes to net metering
      - Grant programs established and administered by the Department of Commerce and Economic Opportunity
      - Clean energy workforce hubs
      - Electric vehicle and transportation incentives



- Upcoming Webinars
  - IPA Power Hour Webinar 3: CEJA's Impact on Illinois Solar for All, Friday, November 12, 2021; 12pm-1pm CDT
  - IPA Power Hour Webinar 4: CEJA's Impact on Utility-Scale Solar and Wind and Brownfield sites, Friday, November 19, 2021;12pm-1pm CDT
  - **IPA Power Hour Webinar 5**: *Creating a Diverse and Equitable Energy Workforce*, Friday, December 3, 2021; 12pm-1pm CDT
  - **IPA Power Hour Webinar 6**: *Decarbonization, from Coal to Renewables*, Friday, December 10, 2021; 12pm-1pm CDT
  - IPA Power Hour Webinar 7: Carbon Mitigation Credits and CEJA's Support for At-Risk Nuclear Plants, Friday, December 17, 2021; 12pm-1pm CDT

## The Illinois Power Agency



- Independent State Agency created in 2007
- Agency duties include
  - Development and implementation of procurement plans for electricity supply for default service customers
  - Development and implementation of other procurement plans such as those to support at-risk nuclear plants (e.g., for Zero Emissions Credits and Carbon Mitigation Credits)
  - Implementation of the Renewable Portfolio Standard
    - Development of Long-Term Renewable Resources Procurement Plan
    - Conduct competitive procurements for utility-scale projects
    - Manage programs for community solar and solar for homes and businesses

## ABP Under FEJA (Public Act 99-0906)

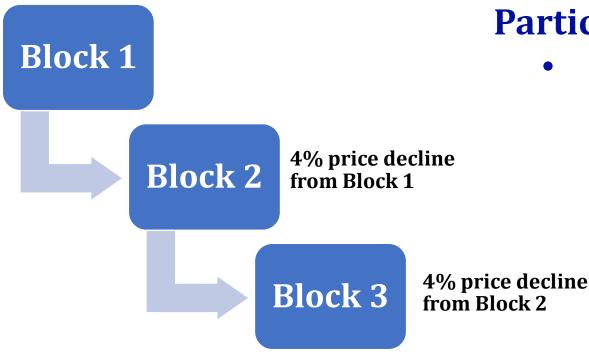
## Adjustable Block Program Overview



#### What is Adjustable Block Program (ABP)?

#### **Declining Block Structure**

As capacity for 1<sup>st</sup> block is filled, continue to 2<sup>nd</sup> block and so on



#### **Participation through Approved Vendors**

 Illinois residents participate in the Program with the help of Approved Vendors

#### **ABP Service Territory**



## All ABP Projects



#### **Group A (Ameren + MISO)**

- Small DG
- Large DG
- Community Solar

#### Group B (ComEd + PJM)

- Small DG
- Large DG
- Community Solar

## Adjustable Block Program Overview



#### What is Adjustable Block Program (ABP)?

- Contrast to what Agency had before (competitive procurements)
  - Previously: Supplemental Photovoltaic ("SPV") program
  - Now: Blocks of capacity with set REC prices
  - Future of Program: To be discussed later in presentation
- Set REC prices in ABP provide stability to the market

## **FEJA (Public Act 99-0906)**



#### Program Structure as outlined by FEJA

- Project Categories:
  - Small Distributed Generation (<10kW AC)</li>
  - Large Distributed Generation (10-2,000 kW AC)
  - Community Solar
- Initial capacity for each category:

	Small DG	Large DG	Community Solar
Group A (Ameren territory)	49.5 MW	49.5 MW	49.5 MW
Group B (ComEd territory)	117 MW	117 MW	117 MW

## **FEJA (Public Act 99-0906)**



#### Program Structure as outlined by FEJA

#### Discretionary Capacity (Block 4) in MW:

	Small DG	Large DG	Community Solar
Group A (Ameren territory)	0	91.5 MW	12 MW
Group B (ComEd territory)	0	33 MW	30 MW

## **FEJA (Public Act 99-0906)**



#### Program Structure as outlined by FEJA

- REC Contract
  - Payments for RECs are made to Approved Vendors for the production of their customers' solar systems through a contract called the REC contract
- Different contract payment terms by project category
  - Small DG: Full contract amount paid upfront upon Energization
  - Large DG: 20% upfront payment, then rest of expected payments made across next 4 years of contract
  - **Community Solar:** 20% upfront payment, then rest of expected payments made across next 4 years of contract

#### **Development of REC Prices for ABP**



- Administratively Set in accordance with the Illinois Power Agency Act (20 ILCS 3855)
- Addressed via Long-Term Renewable Resources Procurement Plan (LTRRPP)
- National Renewable Energy Lab's Cost of Renewable Energy Spreadsheet Tool ("CREST") modeling approach

## **Successes and Challenges to Date**

## **Program Blocks - Community Solar**



- Oversubscription of Community Solar
  - Huge interest at Program opening filled capacity
  - Massive waitlists that wouldn't be filled
- Community solar mostly large, agrarian, transactional
  - Good subscription offers (cost savings), but not community-based

## Program Blocks - Distributed Generation PA

- DG categories operated like a declining block program
   & continued to be open as planned
  - Especially true of Small DG, which stayed open for a while
  - Last block for both Group A and Group B closed in December 2020
  - Last block for both Group A and Group B Large DG closed in March 2020

## **Program Timeline**



- 2018 Scoping and implementation of ABP begins
- January 2019 Program opens
  - Community solar blocks are quickly filled
- December 2020 Small DG and Large DG blocks filled
- Dec. 2020 Sept. 2021 Program awaits funding for new blocks of capacity
- September 2021 CEJA passed allowing for new blocks to open on December 14<sup>th</sup>

## **Program Funding**



- Funding Issues
  - Inability to roll over collections under Section 16-108(k)
  - Resultant freeze on supporting additional projects
  - Efforts to figure out what to do if insufficient funds remained for 2021-22 delivery year (i.e., if no bill passed)
- Funding Fix
  - Passage of CEJA on September 15, 2021

## **Program Impact**

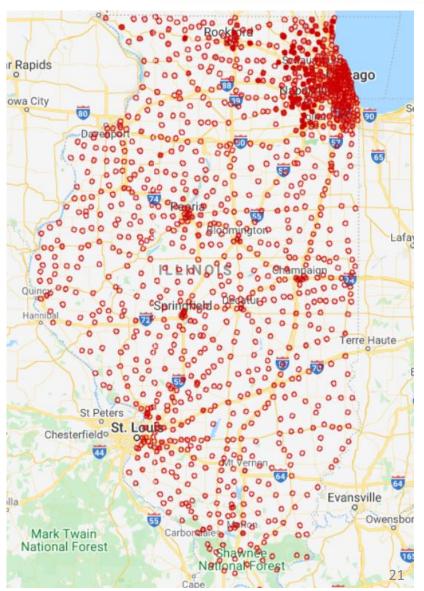


- Program has led to the development of over 670 MW of new solar in Illinois
  - Large DG
    - 2,426 projects
    - 296 MW
  - Small DG
    - 23,513 projects
    - 169 MW
  - Community Solar
    - Over 13,000 subscribers to ABP community solar projects
    - 48 of 111 approved Community Solar projects have been energized to date
    - 214 MW

## **Program Impact**



- REC targets met!
  - 1,000,000 RECs by end of 2020 delivery year met through REC contracts
- Good general geographic diversity of projects across the state
- Over 300 Approved Vendors active in the Program



## **Key Changes to ABP Under CEJA (Public Act 102-0662)**

#### **Changes in ABP Scale**



#### RPS budget

- From 2.015% of 2007 rates to 4.25% of 2009 rates with capacity
- From ~\$230m to well over \$500m

#### REC delivery targets

- 45,000,000 RECs from new projects delivered annually by 2030
- No longer 1m, 1.5m, 2m ABP targets
- If 55% from solar, and 50% of solar from ABP, then 12.375m
  - But need to back out existing contracts and work
- Even just 10,000,000 RECs delivered annually = 6500+ MW

#### Long-Term Plan role

#### **Changes in ABP Structure**



- Three to six categories (with size changes to some)
- New focuses
  - Specific project types
  - Equity block
- Different contract terms
  - No more either full up-front (Small DG) or 20% up-front and remaining 80% across next four years (Large DG and CS)
- No discretionary capacity
  - uncontracted capacity is allocated to waitlisted projects from other categories
- Annual block structure

#### **Diversity and Equity Focus in New ABP**



- Dedicated block for EEC applicants
- Workforce requirements after long-term plan
- Data reporting
- Diversity report
- Disparity study

#### **New ABP Labor Requirements**



- Prevailing wage applicable ABP categories
- Prevailing wage exceptions
  - Residential Projects
  - Houses of Worship
  - Waitlisted Large DG projects
- New Constructed Projects not on waitlist?

# New ABP Categories Category by Category Review

#### **ABP Small Distributed Generation**



- Change from 10 kw to 25 kw max size for qualification
- "at least 75 MW" capacity on Reopening
- Price 4% below last published prices for reopening
- 20% of ABP capacity going forward
- Full up-front payment for both block reopening and after
- Prevailing wage for non-residential (some portion of sub-25 kW projects)

### **ABP Large Distributed Generation**



- 25 kw to 5 MW (both different than before)
- "at least 75 MW" capacity on Reopening
- REC pricing for Large DG
  - Price 4% below last published block prices for waitlisted projects
  - New published adjusted to account for prevailing wage for non-waitlisted projects
- Program Capacity of Large DG
  - 20% of ABP capacity going forward
  - May create subcategories within that 20% based on customer type
- Contract Structure
  - Waitlisted projects feature 15 year contracts with 20% up front paid over 4 years
  - Non-waitlisted projects are 15% up front, remainder over 6 years
- Prevailing wage
  - Waitlisted projects expressly exempted from prevailing wage
  - Non-waitlisted fall under (Q)(1)

## **ABP "Traditional" Community Solar**



- Project Qualification
  - Only waitlisted projects on reopening (first two years), thus 2 MW limit
  - Community solar projects up to 5 MW thereafter
- 250 MW capacity on reopening (two years of blocks)
  - Capacity awarded based on ordinal waitlists
  - · Projects may be resized and later substituted
- REC Pricing
  - Prices 10% lower than last published block prices on reopening
  - 50% small subscriber commitment
- Program Capacity of Community Solar
  - 30% of ABP capacity going forward
  - New project applications begin with year 3 however
- Contract is for 20 years of REC deliveries, paid upon delivery
- Prevailing wage
  - Express application of prevailing wage to waitlist
  - (Q)(1) applies thereafter

#### **ABP Public Schools Projects**



- Project Qualification
  - Project must be located at public school
  - No specification of DG or CS
- "at least 50 MW" capacity on reopening
- Last Large DG block price on Reopening
- Program Capacity of Public Schools Projects
  - 15% of Program Capacity going forward
  - "Projects located within environmental justice communities or within Organizational Units that fall within Tier 1 or Tier 2 shall be given priority" within that 15%
- Contract is for 20 years of REC deliveries, paid upon delivery
- Prevailing wage applies under (Q)(1)

## ABP Community-Driven Comm. Solar



- Qualitative Criteria for Scoring Process for qualification
  - Begin with last long-term plan criteria for reopening
  - Shift into statutory criteria
- "at least 10 MW" for "first block of annual capacity", but 2 years of capacity reopen
- No statement in law re: pricing upon reopening
- 5% of Adjustable Block Program capacity going forward
- Contract features 15% up front, remainder over 6 years
- Prevailing wage applies under (Q)(1)

## **ABP Equity Eligible Contractor Block**



- Qualification for Block
  - Applicant must be an "equity eligible contractor"
  - System can be distributed generation or community solar post-reopening
- "first two blocks of annual capacity" shall be for "at least 75 MW total capacity"
- Pricing on Reopening shall be 4% below last open Small and Large DG blocks
- "at least 10%" of Program capacity going forward, but can climb up to 40%
- Other category pricing and contract structure applies, but with eventual predevelopment capital advancement
- Prevailing Wage applies via other category qualifications found in (Q)(1)

# Adjustable Block Program Block Reopening

## **ABP Block Reopening Timeline**



Effective
Date of P.A.
102-0662
(Sept 15)

REC Contract Publishing (Oct 19)

Block Closings (No 1st) Guidance on any open issues

















Comment Request (Oct 14) Workshop (Oct 21, more) Comments Due (Nov 4, 9, more) Block Reopening (Dec 14)

#### **ABP Reopening Comment Processes**



- Program reopening processes
  - Proposed Residential and House of Worship Classifications
  - Equity Eligible Contractor Proposed Process (Corrected Oct. 21)
  - Prevailing Wage Requirement Proposed Process
  - Public School Projects Category
  - Proposed Process for Collection of Demographic and Geographic Data
  - Proposed REC Prices for Large DG Category Non-waitlisted Projects
  - Community Driven Community Solar
- REC delivery contract process
  - Two contract forms, one process
- Community Solar Waitlist Allocations (not yet published)

# ABP & Long-Term Plan Development

## **Long-Term Plan Development**



Effective Date (Sept 15, 2021)

Publish by January 13, 2022 (120 days after)

45 days for comments 21 days for revision (mid-March 2022 filing) 120 for plan approval with the ICC (wraps up mid-July)

#### **Key ABP Issues for Long-Term Plan**



- REC pricing model
  - Last Plan approaches
  - Prevailing wage
- Future block quantities (and thus overall ABP size)
  - Annual block model
  - Budget/target interaction
- Community-driven community solar
  - Different approach than reopening
  - Mandatory plus optional criteria
- Consumer protection (future webinar)
- Predevelopment capital for EEC block (future webinar)
  - What is the right balance?
  - What is the right qualification criteria?

## **Questions & Answers**

## For Project-Related Questions: **Contact the ABP Program Administrator at** Email: admin@illinoisabp.com

Phone: (877) 783-1820

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